

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ELENA DINVERNO,

Case No: 21-cv-11001

Plaintiff,

Hon. Mark A. Goldman

v.

ROCHESTER COMMUNITY SCHOOLS
DISTRICT, KRISTIN BULL and DR.
ROBERT SHANER,

Defendants.

DEFENDANTS' WITNESS AND EXHIBIT LIST

NOW COME Defendants, ROCHESTER COMMUNITY SCHOOLS DISTRICT, KRISTIN BULL and DR. ROBERT SHANER, by and through their attorneys, Plunkett Cooney, and hereby identifies the following as potential witnesses who may be called to testify on Defendant's behalf at the time of trial:

1. Elena Dinverno, Plaintiff.
2. Kristin Bull
3. Dr. Robert Shaner
4. Martin Blake
5. Sandra Blake
6. Robert Sharpe
7. Andrew Blake

8. Stacey Sunde
9. Any and all family members of Elena Dinverno who may have personal knowledge of the allegations in her complaint, including, but not limited to:
10. Any and all friends of Elena Dinverno who may have personal knowledge of the allegations in her complaint.
11. Any and all current or former employees, agents, representatives and keepers of records for the Rochester Community Schools District including but not limited to:
 - a. Debi Fragomeni
 - b. Lori Grein
 - c. Andrea Walker-Leidy
 - d. Barb Anness
 - e. Michelle Bueltel
 - f. Scott Muska
 - g. Kevin Beers
 - h. Michael Zabat
12. Any and all employees, former employees, agents and keepers of records of any of Plaintiff's current or prior educational institutions.
13. Any and all employees, former employees, agents and keepers of records of any of Plaintiff's current or prior employers, including, but not limited to:
 - a. Blake's Hard Cider/Blake's Orchard
 - b. Brain Balance of Oakland County

- c. WinterGreen II Landscape
 - d. DoorDash
 - e. ZYIA
- 14. Any and all employees, former employees, agents and keepers of records of the Rochester Hills Police Department.
- 15. Any and all employees, former employees, agents and keepers of records of the Shelby Township Police Department.
- 16. Any and all employees, former employees, agents and keepers of records of the Oakland County Sheriff's Department.
- 17. Any and all of Plaintiff's treating physicians and/or healthcare providers.
- 18. Any and all employees, former employees, agents, and Custodian of Records of the Internal Revenue Service.
- 19. Any and all employees, former employees, agents, and Custodian of Records of the Michigan Treasury Department.
- 20. The following possible experts:
 - a. Elissa P. Benedek, M.D. (expert-psychiatry) and records custodian
2311 E. Stadium Blvd., Ste. 111
Ann Arbor, MI 48104
 - b. Sharon Filas, CPA (expert-accountant, economist) and records custodian
Plante & Moran, PLLC
27400 Northwestern Hwy.
P.O. Box 307
Southfield, MI 48037-0307

- c. Suzanne Tarchala, CPA, CFF (expert-accountant regarding economic loss) and records custodian
Matson, Driscoll & Damico
1700 West Big Beaver Road, Suite 215
Troy, MI 48084
- 21. Defendants reserve the right to add other and further expert witnesses as this case proceeds.
- 22. Any and all witnesses identified in subsequently occurring depositions, interrogatories and document productions.
- 23. Any person and/or expert identified on Plaintiff's Witness List.
- 24. Defendants reserve the right to call replacement, rebuttal, and impeachment witnesses, as necessary.
- 25. Any and all persons needed to lay the foundation for the admissibility of documents at trial.
- 26. Defendants reserve the right to amend its Witness List and add additional witnesses as they become known or necessary through the course of discovery and prior to trial, as depositions have yet to be taken.

EXHIBITS

- 1. Media articles regarding Plaintiff's allegations.
- 2. Electronic mail (e-mails), text messages, blog posts, social media messaging or posts (i.e., Facebook, Twitter, Instagram, etc.), that relate to the allegations contained within Plaintiff's Complaint.
- 3. Any and all witness statements and affidavits obtained.
- 4. Records regarding the reasoning for the termination of Plaintiff's employment by Blake's Hard Cider.
- 5. Records from Plaintiff's prior and subsequent employers.

6. Records from Plaintiff's prior and subsequent treating physicians and/or healthcare providers.
7. Any and all documents regarding Plaintiff's credibility.
8. Any and all documents regarding Plaintiff's attempt to mitigate damages.
9. Any and all exhibits identified by Plaintiff.
10. Any and all necessary rebuttal exhibits.
11. Any and all exhibits which may be discovered during the course of discovery and prior to trial.
12. Any and all exhibits to depositions.
13. Defendants reserve the right to amend its Exhibit List and to add additional exhibits as they become known through the course of discovery and prior to trial.

RESERVATION OF RIGHTS

Defendants specifically reserve the right to amend this Witness List and Exhibit List to add or delete witnesses and exhibits as discovery in this case progresses, and as justice otherwise requires.

Respectfully submitted,

/s/ Courtney L. Nichols

Courtney L. Nichols (P75160)
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PROOF OF SERVICE

The undersigned certifies that on January 3, 2022, a copy of the foregoing document was served upon the attorney(s) of record in this matter at their stated business address as disclosed by the records herein via:

<input type="checkbox"/> Hand delivery	<input type="checkbox"/> Overnight mail
<input type="checkbox"/> U.S. Mail	<input type="checkbox"/> Facsimile
<input type="checkbox"/> Email	<input checked="" type="checkbox"/> Electronic Filing System

I declare under the penalty of perjury that the foregoing statement is true to the best of my information, knowledge and belief.

/s/ Gina Amesse

Gina Amesse